



Kraft Foods

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Dear Dr Vogal:

As Senior Director of Corporate Security for Kraft Foods, I oversee a screening program, which did over 13,000 hair tests last year. We have been impressed with the ability of hair to identify drug users, and applaud SAMHSA's move add this technology to the Federal guidelines.

I am concerned, however, about the proposed testing protocol for test subjects with insufficient head hair. The NPRM requires that these applicants be tested with urine rather than have their body hair collected. Since hair looks at drug use over a period of several months, and urine looks at only a few days, the guidelines are providing an easy way for drug users to avoid a positive test result. If these guidelines stand as written, every drug user will simply shave his head before a pre-employment drug test, then lay off drugs for a few days in order to pass the urine test. The bottom line is that drug users will end up in the workforce.

The rationale given for this requirement is that body hair collection is "intrusive". We have had thousands of body hair collections at Kraft, and I have not heard any complaints that the procedure was intrusive or embarrassing. I can support a prohibition on pubic hair collection, but clipping hair from arms, legs, chests, or underarms is certainly acceptable.

Please let me know if I can provide clarification on this point.

Best regards,

Greg J. Halvacs
Sr. Director Global Security